

Sing Sing Correctional Facility-medical records;

C. A compilation of any category of damages claimed by the disclosing party and materials upon which such compilation is based.

Personal injury to back, wrists, head, face, neck and rectum.

Plaintiff suffered permanent nerve damage to wrist and hands.

Plaintiff was sexually assaulted by a police officer during the course of his arrest. The police officer inserted his finger (s) into Plaintiff's rectum. This caused psychological damage to which Plaintiff is undergoing psychiatric treatment. Plaintiff suffers from post-traumatic stress disorder. Plaintiff relies on the medical records at the time of the incident and thereafter.

D. Any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of the judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Not applicable to plaintiff.

2. A. Expert Witness Disclosure

Plaintiff has not yet retained the services of a expert to testify on her behalf at the trial of this matter. When an expert is so retained, a further response to this demand will be forthcoming.

Plaintiff, MELVIN GRADY, reserves its right to amend and/or supplement this response, as provided for and required by the Federal Rules of Civil Procedure.